

**MARCOS D. JIMENEZ, P.A.**

255 Alhambra Circle, 8<sup>th</sup> Floor  
Miami, FL 33134  
Tel. 305-570-3249  
mdj@mdjlegal.com

September 19, 2022

**VIA ECF**

Hon. Sarah Netburn  
United States Magistrate Judge  
Thurgood Marshall Courthouse  
40 Foley Square, Room 430  
New York, New York 10007

**RE:** *Stansell, et al. v. Revolutionary Armed Forces of Colombia (FARC)*,  
Case No. 1:16-mc-00405-LGS-SN, and *Pescatore, et al. v. Pineda, et al.*,  
Case No. 1:18-mc-00545-LGS-SN,

Dear Judge Netburn:

Third-Party-Defendant Ministerio del Poder Popular de Economía, Finanzas y Comercio Exterior (Venezuela’s “Ministry of Finance”), pursuant to Federal Rule of Civil Procedure 6(b)(1) and Section I(G) of Your Honor’s Individual Practices in Civil Cases, respectfully submits this unopposed request for an enlargement of time to respond to Citibank’s Interpleader Complaint (ECF No. 280), until and through January 25, 2023.<sup>1</sup>

Citibank has informed the Ministry of Finance that it consents to the enlargement.

The Ministry of Finance seeks this enlargement because the United States has expressed its intention to file a Statement of Interest in the Western District of New York to address whether TRIA can be used to seize the assets of a foreign sovereign that has not been declared a “state sponsor of terrorism.” *Caballero v. FARC*, 20-mc-00040 (W.D.N.Y.). This issue directly impacts the Ministry of Finance, which is an agency or instrumentality of a non-state sponsor of terrorism (Venezuela). Briefing on the Statement of Interest will conclude on December 20, 2022. *Id.* at ECF No. 124. The requested extension will enable the Ministry of Finance to adequately address the United States’ position when responding to Citibank’s Interpleader Complaint.<sup>1</sup>

By filing this letter, the Ministry of Finance does not waive and expressly preserves any rights and defenses, including but not limited to defenses based on personal jurisdiction, subject-matter jurisdiction, and service of process.

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<sup>1</sup> This is the Ministry of Finance’s third unopposed request for enlargement of time to respond to Citibank’s Interpleader Complaint; the previous two requests were granted. *See* ECF Nos. 459–462.

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Respectfully submitted,

s/ Marcos Daniel Jiménez

Marcos Daniel Jiménez

New York Bar No. 4881736

**Marcos D. Jiménez, P.A.**

255 Alhambra Circle, 8th Floor

Miami, Florida 33134

Telephone: 305.772.6026

Email: mdj@mdjlegal.com

*Counsel for Third-Party Defendant Ministerio del  
Poder Popular de Economía, Finanzas y Comercio  
Exterior*

cc: All counsel of record via ECF